

SABRINA P. SHROFF
ATTORNEY AT LAW

80 BROAD STREET, 19TH FLOOR
NEW YORK, NEW YORK 10004
TEL: (646) 763-1490

December 29, 2023

By ECF

Hon. Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

United States v. Nadim Konoshchenok, 22 Cr. 409 (HG)
(Motion for a continuance of January 23, 2024 hearing)

Dear Judge Gonzalez:

With consent of the government and all defense counsel, I write to seek a continuance of the January 23, 2023, status conference. I am unavailable to for the appearance as I am to speak before the Parliamentary Assembly of the Council of Europe (PACE), in Strasbourg, Paris from January 23 to January 25, 2024.

All parties, including the government, consent to the adjournment and are available in the second/third week of February. Additionally, because the defense is still reviewing discovery and working towards a pre-trial disposition, time is properly excluded under the speedy trial act.

To that end, should the Court grant this request, we ask that the time between January 23, 2023, and the next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161 (h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial, because it will allow the government and counsel for each defendant to continue discussions regarding a possible disposition in the matter, or in the alternative prepare for trial.

Respectfully submitted,

/s/ Sabrina Shroff
Counsel to Mr. Vadim Konoschenok